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BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Suite TW-A325
Washington, D.C. 20554

**Re: EB Docket No. 06-36
Annual CPNI Certification for OnStar Corporation**

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Commission's rules, enclosed please find OnStar Corporation's annual Customer Proprietary Network Information (CPNI) certification. Please contact me directly with any questions.

Respectfully Submitted,

/s/ Ari Q. Fitzgerald

Ari Q. Fitzgerald
Counsel to OnStar Corporation

Enclosures

cc: Enforcement Bureau, Telecommunications Consumers Division
Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

This Annual 64.2009(e) CPNI Certification covers the period from December 8, 2007, through December 31, 2007. A separate CPNI certification for the period from January 1, 2007, through December 7, 2007, has been executed and is maintained by the company.

Name of company covered by this certification: OnStar Corporation ("OnStar")

Form 499 Filer ID: 822794

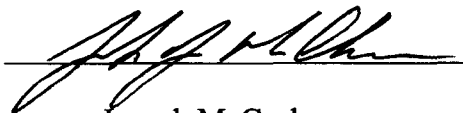
Name of signatory: Joseph McCusker

Title of signatory: Chief Financial Officer

I, Joseph McCusker, certify that I am an officer of the company named above and acting as an agent of the company, and that, to the best of my personal knowledge, information and belief, formed after reasonable inquiry, the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001, *et seq.*

Attached to this certification is an accompanying "OnStar Corporation Explanatory Statement Regarding 2007 CPNI Compliance," which explains how OnStar's procedures during the above-referenced certification period were designed to ensure compliance with the requirements set forth in Section 64.2001, *et seq.*, of the Commission's rules.

OnStar has not taken any actions against data brokers during the above-referenced certification period, and it is not aware of any activity by data brokers for which action should have been taken. OnStar also did not receive any customer complaints during the above-referenced certification period concerning the unauthorized release of CPNI.



Joseph McCusker
Chief Financial Officer
OnStar Corporation
400 Renaissance Center
MC482-D39-B-32
Detroit, MI 48265

2-29-08

Date

OnStar Corporation

Explanatory Statement Regarding 2007 CPNI Compliance

OnStar Corporation (“OnStar” or “Company”) provides this statement pursuant to 47 C.F.R. § 64.2009(e) of the Commission’s rules to explain how OnStar’s operating procedures are designed to comply with the Commission’s customer proprietary network information (“CPNI”) regulations. As explained below and as stated in the attached certification by Joseph McCusker, OnStar is in compliance with the Commission’s CPNI rules as set forth at 47 C.F.R. §§ 64.2001, *et seq.* OnStar is a reseller of CMRS service, and its “Hands-Free Calling” is a pre-paid service that does not generate and is not reflected in customer invoices. OnStar obtains only a limited amount of CPNI that is accessible to and maintained by its underlying facilities-based providers of telecommunications service.

Compliance Certification

An officer of OnStar is required to sign and file with the Commission an annual compliance certification. The certification is based on the personal knowledge of the certifying officer, acquired through personal knowledge, information, and reasonable inquiry, and states that OnStar has established operating procedures designed to ensure compliance with the Commission’s CPNI rules.

CPNI Use

OnStar does not use, disclose, or permit access to CPNI to third parties without customer approval, except as permitted by law. Accordingly, the customer notice and associated record-keeping requirements of the Commission’s CPNI rules are not applicable.

Procedures Designed to Ensure the Privacy and Security of CPNI

OnStar takes its obligations regarding the privacy and security of CPNI seriously and has implemented reasonable measures and controls to ensure compliance with the FCC’s CPNI rules. These measures and controls also are intended to enable OnStar to discover and protect against attempts by third parties to gain unauthorized access to CPNI. OnStar reviews daily reports regarding instances in which CPNI has been accessed to determine whether any unauthorized breaches have occurred. OnStar also has implemented comprehensive procedures governing the handling and storage of CPNI. As part of these measures, OnStar limits internal access to CPNI and conducts internal investigations and audits to evaluate the security of CPNI data on a regular basis.

Several OnStar employees are dedicated to privacy and data security issues, including those pertaining to CPNI. Together, these individuals work in concert with other OnStar employees to implement OnStar’s privacy and security policies, which are designed to protect customer information, including CPNI.

In addition to its internal policies, which are designed to ensure compliance with the Commission’s CPNI Rules, OnStar has a Privacy Statement available on its website. The

Privacy Statement explains how OnStar collects, uses, and shares personal and car-specific information that OnStar obtains in connection with the services it provides to customers in the United States.

Record Retention for Marketing Campaigns

OnStar has established procedures to maintain records of sales and marketing campaigns that rely on its use of CPNI as permitted by law. The records include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. OnStar maintains these records for at least one year. OnStar also has a supervisory review process regarding compliance with the CPNI rules for its outbound marketing campaigns and maintains records of its compliance for at least one year.

Customer Authentication

OnStar has established procedures that require proper authentication prior to disclosing CPNI. OnStar requires customers making inquiries by telephone for non-call detail information to authenticate their identity through, among other methods, a PIN/password program, before providing those customers with non-call detail information. However, OnStar does not disclose call detail information over the telephone in response to customer-initiated telephone contacts. OnStar requires all requests for call detail information to be in writing, and responds to written requests for call detail information and other CPNI by sending a written response to the address of record. Online account access to OnStar CPNI is not available at this time.

Employee Training and Discipline

With regard to the very limited amount of customer data that OnStar obtains in connection with its provision of "Hands-Free Calling" service, OnStar has trained its employees with respect to the appropriate handling of such data, including CPNI. OnStar augments this Company-wide training with targeted training for OnStar service advisors regarding the proper authentication of customers making inbound inquiries by telephone.

OnStar has an express written policy that states that any employee who fails to follow OnStar policies and procedures, including those relating to the proper use of CPNI, will be subject to disciplinary action, up to and including termination.

Account Changes

Whenever a PIN/password, customer response to a back-up means of authentication for a lost or forgotten PIN/password, online account, or address of record is created or changed, OnStar mails a notice to the customer's address of record. Such notices are sent only to an address associated with the customer's account for at least 30 days (except for accounts activated within the last 30 days, in which case the notice is sent to the address provided at the time of account activation). The notices do not reveal the specific changed information.

Security Breaches

OnStar has policies and procedures to notify law enforcement as soon as practicable, but in no event later than seven (7) business days after a reasonable determination has been made that a breach of a customer's CPNI has occurred. It is OnStar's policy to notify customers of a breach of their CPNI no sooner than the eighth business day following completion of the notice to law enforcement unless directed by the U.S. Secret Service or the FBI not to so disclose or notify customers. OnStar also has policies and procedures to respect any written agency request from the U.S. Secret Service or the FBI that OnStar not disclose the breach for an initial period of up to 30 days, which may be extended further by the agency.

Recordkeeping

OnStar maintains procedures for keeping a record for at least two years of all CPNI security breaches, notifications made to law enforcement, and notifications made to customers.

Customer complaints concerning the unauthorized release of CPNI are reported and investigated internally, and OnStar maintains policies and procedures to maintain a record of such complaints by category (e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, and instances of improper access to online information by individuals not authorized). A summary of such customer complaints is included in OnStar's annual CPNI certification. OnStar received no such complaints during this reporting period.

A record of any actions taken by OnStar against pretexters and data brokers is maintained and an explanation of such actions is included with OnStar's annual certification to the Commission, including any information OnStar has with respect to the processes pretexters and data brokers may have used in an attempt to access CPNI. If any action is taken against pretexters or data brokers, or if OnStar becomes aware of any information with respect to the processes pretexters and data brokers may have used in an attempt to access CPNI, OnStar reports such action or information in its annual CPNI certification. OnStar did not take any actions against pretexters or data brokers during this period. Moreover, OnStar acquired no information regarding the activities of such parties.

Policy Changes

Should OnStar change its policies such that the use, disclosure, or permitted access to CPNI requires customer approval, appropriate customer notice (including appropriate opt-out procedures and opt-out failure reporting), recordkeeping, and FCC notification practices will be implemented.